

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

LEON TRADING SA,

Petitioner,

10 CIV

-v-

M.Y. SHIPPING PRIVATE LTD and
VARDHMAN SHIPPING APS,

**DECLARATION OF
GEORGE M. CHALOS**

Respondents.

-----X

State of New York)

County of Nassau)

I, GEORGE M. CHALOS, an attorney at law, declare under penalty of perjury of the laws of the United States of America as follows:

1. I am an attorney admitted to practice before this Honorable Court and am counsel for Petitioner LEON TRADING SA. I am the principal of Chalos & Co, P.C., and am a member in good standing of the bar of this Honorable Court.

2. I submit this Declaration based on facts and information known to me personally, as well as documents and information provided to me by my clients and their representatives, all of which I believe to be true and accurate.

3. Attached to this Declaration as Exhibits in support of LEON TRADING SA's Petition to Recognize, Confirm, and Enforce Foreign Arbitral Award are the following Exhibits:

Exhibit 1: New York Department of State Registration for M.Y. Shipping Private Limited

Exhibit 2: New York Department of State Registration for Vardhman Shipping APS

Exhibit 3: Charter Party Agreement for M/T M.Y. ADRIATIC dated September 22, 2008

Exhibit 4: Side Letter – dated October 16, 2008

Exhibit 5: First Final Arbitration Award – Issued September 22, 2009

WHEREFORE, and for the reasons more fully set forth in the Petition to Recognize, Confirm and Enforce Foreign Arbitration Award and the accompanying Memorandum of Law, Petitioner LEON TRADING SA, respectfully requests this Honorable Court enter an Order granting the Petition and grant LEON TRADING SA such other and further relief as may be just and equitable.

Dated: Oyster Bay, New York

January 7, 2010

CHALOS & CO, P.C.
Attorneys for Petitioner
LEON TRADING SA

By: _____


George M. Chalos (GC-8693)
123 South Street
Oyster Bay, New York 11771
Tel: (516) 714-4300
Fax: (516) 750-9051
Email: gmc@chaloslaw.com